

# EXHIBIT C

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : Case No. 23-bk-02771-HWV  
PENN CENTER HARRISBURG, L.P. :  
Debtor : Chapter 11  
:

**DEBTOR'S MOTION FOR APPROVAL FOR DEBTOR  
TO PAY PRE-PETITION PAYROLL**

The Motion of Penn Center Harrisburg, L.P. ("Debtor"), by and through its attorneys, Cunningham, Chernicoff & Warshawsky, P.C., for Approval for Debtor to Pay Pre-Petition Payroll is as follows:

1. On December 7, 2023, the Debtor filed a voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code (the "Code"). As a result thereof, the Debtor has been appointed as a Debtor-in-Possession and operates its business and manages its assets.
2. The Debtor is a Pennsylvania limited partnership engaged in the ownership and management of commercial real estate (the "Business").
3. The Debtor currently has approximately six (6) employees. These employees are needed to provide Debtor's services to its customers.
4. The Debtor makes its payroll on a biweekly basis. The amount of each gross payroll, including payroll taxes, is approximately \$22,548.60.
5. The next payroll of the Debtor is to be paid on December 15, 2023. Such payroll covers the period November 29, 2023 through December 13, 2023.
6. The payroll to be paid by the Debtor on December 15, 2023, includes pre-Petition periods of time.
7. No single employee will receive a single paycheck in excess of \$12,475.00.

8. It is essential that the Debtor continue to maintain its employees so that the Debtor may provide services to its customers. In the event that the Debtor is not permitted to make its payroll, the Debtor's employees may terminate their employment therefore causing the Debtor to be unable to provide services to its customers.

9. In the event that the Debtor cannot provide services to its customers, such customers will be greatly harmed. The Debtor's business will suffer and the Debtor's efforts to successfully reorganize will be harmed.

10. The Debtor believes it will be able to successfully reorganize.

**WHEREFORE**, Penn Center Harrisburg, L.P., the above named Debtor, respectfully requests that this Honorable Court enter an Order permitting the Debtor to make its next scheduled payrolls notwithstanding the fact that such payrolls would include a pre-Petition period of time.

Respectfully submitted:

CUNNINGHAM, CHERNICOFF  
& WARSHAWSKY, P.C.

By: /s/ Robert E. Chernicoff  
Robert E. Chernicoff, Esquire  
Attorney I.D. No. 23380  
2320 North Second Street  
P. O. Box 60457  
Harrisburg, PA 17106-0457  
(717) 238-6570

Date: December 7, 2023

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : Case No. 23-bk-02771-HWV  
PENN CENTER HARRISBURG, L.P. :  
Debtor : Chapter 11  
:

**ORDER**

The Motion of the Debtor, Penn Center Harrisburg, L.P. ("Debtor") for Approval to Pay Pre-Petition Payroll having come before the Court, and the Court having determined that it is in the best interests of the Debtor that the Debtor be allowed to pay its pre-Petition payroll; it is

**HEREBY ORDERED that:**

1. The Motion is approved. All capitalized terms not defined herein shall have the same definition as in the Motion.
2. The Debtor is permitted to pay its payroll due on December 15, 2023, and any other payrolls, notwithstanding the inclusion of a pre-Petition period of time in such payroll. All such payments shall not exceed and shall be subject to the maximum amount set forth in Section 507(a)(4) of the Bankruptcy Code.